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**OHIO EPA COMMENTS AND RESPONSES TO
REMOVAL ACTION NO. 9 - REMOVAL OF WASTE
INVENTORIES (REFERENCE 1) AND**

XX-XX-XX

**4
ENCLOSURE**

Enclosure I

Page 1

Ohio EPA comments and responses to Removal Action No. 9 - Removal of Waste Inventories (Reference 1) and Thorium Low Level Waste Management Activities Outline (Reference 2).

A. Removal of Waste Inventories (Reference 1)

Comment 1: Page 3, para. 1: The text states, "The primary driving requirement of the FEMP LLW Program is DOE Order 5820.2A, ..." Portions of the order appear to have been omitted, including Section I and II, Attachment 1 (References), and Attachment 2 (Definitions). Provide a copy of the entire order.

Response 1: A copy of the entire DOE Order 5820.2A is enclosed (Enclosure IV). However, Sections I and II are not applicable since the FEMP does not store either high level or transuranic wastes.

Comment 2: One of the implementing procedures, 1-C-604, Inspection of the containerized refuse material and drummed residues, was not included with this submittal. Provide a copy of this procedure.

Response 2: A copy of FEMP 1-C-604 is attached (Enclosure IV).

B. FEMP Thorium Low Level Waste Management Activities (Reference 2)

General Comment:

The description of the document should be clearly stated in the introduction. The title of the document should include the type of document, e.g., removal action work plan, removal action addendum, etc.

General Comment Response:

The FEMP Thorium Low Level Waste Management Activities document was a partial document (Reference 2) which was submitted prior to the date requested in the Amended Consent Agreement. This document was completed by the September 26, 1991 submittal (Reference 3). The title change was made to reflect that these submittals were to be combined to form one document. The August submittal (Part 1) included the specific procedures for overpacking the thorium containers at the FEMP. The September submittal (Part 2) provided the Site procedures which control the thorium management procedures.

FEMP Thorium Low Level Waste Management Activities (continued)

Specific Comments:

Comment: Figure 1, page 6: This figure is difficult to understand. A brief text explanation should be added.

Response: Figure 1, page 6: This figure has been revised to include numbers that correspond to the operation outline on pages 5 and 7.

Comment: Section 4.3, page 9: The possible storing/staging areas should be listed. The possible locations of the newly constructed tension support structures should be listed.

Response: Section 4.3, page 9: This section has been revised to indicate that the newly constructed tension support structure has been removed as a potential interim storage location because the planned location was determined to be unsuitable. The final interim storage location(s) has not been determined at this time. Section 4.3 has been revised to include the notification of both the U.S. EPA and the Ohio EPA when the interim storage location(s) has been identified.

Comment: Section 8, page 10: Analyses must be conducted in accordance with the approved QAPP.

Response: Section 8, page 11: This section has been revised to indicate that the sample analysis will be conducted according to the QAPP to the maximum extent possible. It should be noted that drum sampling and analysis is not currently covered by the approved QAPP but drum sampling and analysis will be conducted according to applicable site protocols.

Enclosure I
Page 3

Ohio EPA comments and responses on Removal Action No. 9 - Removal of Waste Inventories/Thorium Management Procedures (Reference 3):

- Comment 1: Page 3, para. 1: The text states, "The primary driving requirement of the FEMP LLW Program is DOE Order 5820.2A, ..." Portions of the order appear to have been omitted, including Section I and II, Attachment 1 (References), and Attachment 2 (Definitions). Provide a copy of the entire order.
- Response 1: A copy of the entire DOE Order 5820.2A is attached (Enclosure IV).
- Comment 2: Page 5, para. 4: Explain why characterization of the thorium materials currently in inventory at the FEMP will not be required as part of the RI/FS remedial activities.
- Response 2: The Operable Unit 3 (OU 3) work plan and sampling and analysis plan will include characterization of all thorium residues. However, it is envisioned that Removal Action No. 9 will remove the thorium residues prior to initiation of field work under the OU 3 work plan. Page 5, paragraph 4, has been revised to explain this reasoning.